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San Francisco

16 UNITED STATES BANKRUPTCY COURT
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18 NORTHERN DISTRICT OF CALIFORNIA
19
20 SAN FRANCISCO DIVISION

20 In re
21 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,
22
23 Debtor and
Debtor in Possession.

Case No. 23-30564

Chapter 11

**NOTICE OF HEARING ON DEBTOR'S
MOTION TO APPROVE COMPROMISE
AND STIPULATION MODIFYING THE
AUTOMATIC STAY**

25 Date: September 4, 2025
26 Time: 1:30 p.m.
Location: via Zoom
27 Judge: Hon. Dennis Montali
28

1 **NOTICE IS HEREBY GIVEN** that the Roman Catholic Archbishop of San Francisco, the
2 debtor and debtor in possession (“Debtor” or “RCASF”), in the above-captioned chapter 11 case
3 (the “Bankruptcy Case”) has filed a *Motion to Approve Compromise and Stipulation Modifying the*
4 *Automatic Stay* (the “Motion”).¹

5 **NOTICE IS FURTHER GIVEN** that a hearing on the Motion is scheduled for **September**
6 **4, 2025, at 1:30 p.m.** (the “Hearing”), before the Honorable Dennis Montali at the United States
7 Bankruptcy Court, Northern District of California, San Francisco Division (the “Hearing”). The
8 Hearing will not be conducted in the presiding judge’s courtroom but instead will be conducted by
9 videoconference via ZoomGov. The Bankruptcy Court’s website provides information regarding
10 how to arrange an appearance at a video or telephonic hearing. If you have questions about how to
11 participate in a video or telephonic hearing, you may contact the court by calling 888-821-7606 or
12 by using the Live Chat feature on the Bankruptcy Court’s website. The link to the judge’s electronic
13 calendar is: <https://www.canb.uscourts.gov/judge/montali/calendar>.

14 Opposition and comments, if any shall be made on or before August 21, 2025.

15 **NOTICE IS FURTHER GIVEN** that the Motion is supported by the *Declaration of Joseph*
16 *J. Passarello in Support of Chapter 11 Petition and Debtor’s Emergency Motions* [ECF No. 14]
17 (“Passarello Background Decl.”), the *Declaration of Paul E. Gaspari in Support of Chapter 11*
18 *Petition and Debtor’s Emergency Motions* [ECF No. 15] (“Gaspari Decl.”), the additional
19 *Declaration of Fr. Patrick Summerhays in Support of this Motion* (“Summerhays Decl.”), the
20 exhibits filed in support of the Motion, the Request for Judicial Notice filed in support of the Motion,
21 the pleadings and papers on file in this Bankruptcy Case and in the Adversary proceeding, including
22 the complaint filed in the Adversary Proceeding, the Injunction Motion (which as defined in the
23 Injunction Motion includes the supporting declarations), the Stipulation and the opposition filed to
24 the Injunction Motion, and such other evidence and argument, both oral and documentary, as may
25 be presented to the Court at or before the time of the Hearing on the Motion.

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28 ¹ All terms not otherwise defined herein have the same meaning as set forth in the Motion.

1 By the Motion, the RCASF, asks the Court for entry of an order, substantially in the form
2 attached to the Motion as *Exhibit A* (the “Proposed Order”): (a) approving the stipulation attached
3 as *Exhibit 1* to the Proposed Order (the “Stipulation”) modifying the automatic stay for the limited
4 purposes described in the Motion and in the Stipulation; (b) approving the Motion and authorizing
5 the Debtor to take all actions necessary to effectuate the Stipulation; (c) waiving the fourteen (14)
6 day stay period imposed on the order; and (d) granting such other and further relief as the Court
7 deems just and proper under the circumstances.

8 **NOTICE IS FURTHER GIVEN** that this notice does not contain all the particulars of the
9 Motion or supporting documents, nor does it summarize all of the evidence submitted in support.
10 For further specifics concerning the Motion and the relief requested, you are encouraged to review
11 the Motion and the supporting evidence, including the supporting Declarations, copies of which
12 may be obtained from the website to be maintained by the Debtor’s Claims and Noticing Agent,
13 Omni Agent Solutions, Inc., at <https://omniagentsolutions.com/RCASF>, free of charge. You may
14 also access these documents from the Court’s Pacer system (requires a subscription). The web page
15 address for the United States Bankruptcy Court for the Northern District of California is
16 <http://www.canb.uscourts.gov>.

17 **NOTICE IS FURTHER GIVEN** that this Hearing will be conducted only via Zoom. The
18 court’s website offers information explaining how to arrange an appearance at a video hearing. If
19 you have questions about how to participate in a video hearing, you may contact the court by calling
20 888-821-7606 or by using the Live Chat feature on the court’s website.

21 **NOTICE IS FURTHER GIVEN** that that any opposition or response to the Motion must
22 be in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtor at the
23 above-referenced addresses so as to be received by August 21, 2025. Any opposition or response
24 must be filed and served on the Limited Service List as provided in the Final Order Approving
25 Motion to (1) Establish Notice Procedures, (2) File Confidential Information Under Seal, and (3)
26 Temporarily Suspend Deadline for Filing Proofs of Claim at ECF 227. The updated Limited
27 Service List may be obtained from the Omni website listed above. Failure to file timely opposition
28 and appear at the hearing may constitute a waiver of your objections, as this will not be a

1 preliminary hearing contrary to Local Bankruptcy Rule 4001-1. This is a motion to approve a
2 compromise and stipulation modifying the automatic stay. It is the Debtor's position that Local
3 Bankruptcy Rule 4001-1 does not apply. Accordingly, the hearing on this Motion shall not be a
4 preliminary hearing. Your rights may be affected. You should read these papers carefully and
5 discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an
6 attorney, you may wish to consult one.

7 Dated: August 7, 2025

FELDERSTEIN FITZGERALD WILLOUGHBY
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14 Dated: August 7, 2025

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